

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

State of Oklahoma,

Plaintiffs,

v.

Tyson Foods, Inc., et. al.

Defendants.

Case No.: 4:05-cv-00329-GKF-PJC

### DECLARATION OF ROGER TOURANGEAU, Ph.D.

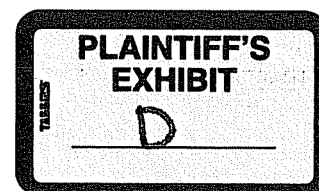
I, Roger Tourangeau, Ph.D., hereby state as follows:

1. I am a Research Professor with the Survey Research Center at the University of Michigan as well as a Research Professor for the Joint Program in Survey Methodology at the University of Maryland. Prior to joining the University of Michigan, I worked at the National Opinion Research Center and the Gallup Organization.
2. In 1979 I received by Ph.D. from Yale University in Psychology. I have nearly 30 years of experience in the field of research science, including survey methodology and research analysis.
3. I am one of the authors of the State of Oklahoma's expert report entitled "Natural Resource Damages Associated with Aesthetic and Ecosystem Injuries to Oklahoma's Illinois River System and Tenkiller Lake – Expert Report for State of Oklahoma, in Case No. 05-CV-0329-GKF-SAJ" (hereinafter "CV Report").
4. I have reviewed the Defendants' Motion to Strike Portions of Plaintiffs' Damages Experts' Report and Integrated Brief (Dkt. # 1950).

2. In 1979 I received by Ph.D. from Yale University in Psychology. I have nearly 30 years of experience in the field of research science, including survey methodology and research analysis.

3. I am one of the authors of the State of Oklahoma’s expert report entitled “Natural Resource Damages Associated with Aesthetic and Ecosystem Injuries to Oklahoma’s Illinois River System and Tenkiller Lake – Expert Report for State of Oklahoma, in Case No. 05-CV-0329-GKF-SAJ” (hereinafter “CV Report”).

4. I have reviewed the Defendants' Motion to Strike Portions of Plaintiffs' Damages Experts' Report and Integrated Brief (Dkt. # 1950).



5. In social science research, particularly social psychology, it is well established, standard and common practice that information be withheld from the participants or that information that is not factually correct be provided to them. The acceptability of this practice is discussed at length in the social science literature.
6. It is often necessary in social science studies generally, and in contingent valuation studies more specifically, that information be withheld from participants or that information that is not factually correct be presented to them so that the participants take the information in the intended way. In the context of a contingent valuation survey, it is important that participants regard their choices as consequential for the results of a contingent valuation survey to be valid and reliable.
7. In the survey discussed in the CV Report, survey respondents were informed about an alum treatment program for the Illinois River Watershed that could be paid for via a tax referendum. Regardless of whether the State ultimately implements an alum program and whether an alum program would be effective, the results of the survey are valid and reliable. Importantly, it is evident from the survey results that a large majority of the respondents understood and accepted the scenario and believed their choice was consequential.
8. The use of the hypothetical alum scenario in the contingent valuation survey was necessary and appropriate under the standard, well-established practices of contingent valuation surveys, and of social science research more generally, and the results of the contingent valuation survey are valid and reliable. The use of a hypothetical scenario in no way renders the results of the study invalid or unreliable.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 19, 2009

/s/ Roger Tourangeau  
Roger Tourangeau, Ph.D.